

STATE OF NEVADA

Department of Conservation & Natural Resources

DIVISION OF ENVIRONMENTAL PROTECTION
BUREAU OF CORRECTIVE ACTIONS

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January 30, 2008

Mr. Kevin Lyng
DCI Management Group, Ltd.
Chief Executive Officer
11811 N. Tatum Blvd.
Phoenix, AZ 85028

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
7005 0390 0002 0502 3259

Subject: Comments on "Addendum to the Monitoring Well Installation Work Plan" (01-28-08)

Facility: Al Phillips the Cleaner (former)
3661 S. Maryland Pkwy
Las Vegas, NV

NDEP ID#: H-000086

Dear Mr. Lyng:

The Nevada Division of Environmental Protection (NDEP) has reviewed the addendum to the work plan for the installation of new borings and wells as part of the on-going environmental investigation for NDEP case H-000086. These additional borings and wells are being installed to better delineate the northern boundary of the tetrachloroethylene (PCE) plume of in shallow groundwater.

The addendum to the work plan states that the following tasks will be performed:

- Determine the location of the irrigation well at the adjacent golf course
- Install two new permanent groundwater monitoring wells
- Drill a minimum of one temporary borehole for collection of a grab groundwater sample
- Survey the wells to a vertical datum to evaluate the groundwater gradient and flow direction at the east end of the plume
- Evaluate the northern boundary of PCE impact to groundwater downgradient of the site based on the additional groundwater analysis
- Report findings of the groundwater assessment

The work plan addendum specifies that *"the investigation methods, quality control measures, and reporting requirements for completion of the investigation will be performed as outlined in the initial work plan."* The addendum goes on to state that *"the location of the first proposed well (MW-31) is at the intersection of Cochise Lane and Tioga Way as indicated on Figure 1. A temporary borehole (B-T2), located along the southbound lane of Spencer Street, approximately 175 feet north of the Cherokee Lane intersection, will be drilled and a grab sample of groundwater will be collected for analysis of volatile organic compounds with a 24-hour turn-around time. If the analytical results from borehole B-T2 indicate a PCE concentration near or*



below the Nevada Drinking Water Standards Maximum Contaminant Level of 5 micrograms per liter ($\mu\text{g/L}$), a permanent well (MW-32) will be installed at that location and an additional temporary borehole (B-T3), located on Cherokee Lane between Spencer Street and Algonquin Drive, will be drilled and a grab groundwater sample collected to further assess the northern perimeter of the PCE plume. However, if the analytical data from borehole B-T2 indicate moderate levels of PCE (approximately $10 \mu\text{g/L}$ or higher), temporary borehole B-T2 will be backfilled in accordance with the protocol outlined in the initial work plan, and permanent well MW-32 will be installed at the alternate location, approximately 100 to 200 feet north of temporary borehole B-T2.”

The **NDEP does not concur** with all the drilling locations outlined above. Rather than drilling B-T3, B-T2, and an alternate to the north of B-T2, the NDEP requests that a permanent well be installed at the intersection of Spencer and Cherokee to monitor long-term changes in PCE concentrations near the core of the plume, which seems to be shifted north of Seneca Lane in this vicinity. And rather than drilling a temporary hole at location B-T3 (air samples from the school were nondetects), the NDEP would prefer a boring in the vicinity of B-T2 and collection of a grab sample for fast-turnaround analysis. If PCE concentrations in this grab sample are less than $50 \mu\text{g/L}$, another well can be installed here to bound the northern extent of the plume. If the concentration from B-T2 exceeds $50 \mu\text{g/L}$, another boring can be drilled approximately 100 to 200 ft north of B-T2 and another well installed to delineate the northern boundary of the plume. Because the NDEP is expanding the resident notification area to include some homes north of Cherokee Lane, these additional data are needed.

The **NDEP concurs** with the work plan addendum, with the following changes:

- Permanent monitoring well MW-32 should be drilled and installed at the intersection of Cherokee and Spencer, to monitor long-term changes in PCE concentrations near the core of the plume.
- Instead of an additional boring at location B-T3 (shown in Figure 1 of the addendum), the NDEP requests that a boring be drilled at location B-T2 and a grab sample be collected. If the PCE concentration in this sample is less than $50 \mu\text{g/L}$, install another well; if it exceeds $50 \mu\text{g/L}$, another boring should be drilled at the alternate location (approximately 350 ft north of the Cherokee/Spencer intersection) and another monitoring well be installed at the alternate location instead.
- Three, rather than two, monitoring wells will be installed under this work plan addendum.
- The boring at location B-T3 is not required.

Adhere to the same field, laboratory, and reporting procedures specified in the work plan of September 24, 2007. Sampling frequency for the new monitoring wells will be established after the NDEP has received and reviewed the initial analytical results.

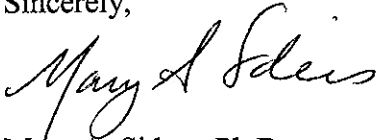
Requirements by NDEP

The NDEP requires that a letter report discussing the results of this additional investigation be submitted by **March 31, 2008**. Please notify the NDEP if any delays are encountered that necessitate an extension of this deadline.

Mr. Kevin Lyng
Al Phillips the Cleaner
H-000086
January 30, 2008
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If you have any comments or questions please contact the NDEP Case Officer, Mary Siders at (775) 687-9496 or email msiders@ndep.nv.gov.

Sincerely,



Mary A. Siders, Ph.D.
Bureau of Corrective Actions
NDEP Carson City

cc:

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